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Attorneys for Plaintiff

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

14 LATIA ALEXANDER, individually as heir of
15 ISAIAH T. WILLIAMS and in her capacity as
Special Administrator of the Estate of ISAIAH
T. WILLIAMS,

16 Plaintiff,

17 v.

18 LAS VEGAS METROPOLITAN POLICE
19 DEPARTMENT, a political subdivision of the
20 State of Nevada; KERRY KUBLA, in his
individual capacity; BRICE CLEMENTS, in
21 his individual capacity; ALEX GONZALES,
in his individual capacity; RUSSELL
22 BACKMAN, in his individual capacity;
JAMES ROTHENBURG, in his individual
23 capacity; JAMES BERTUCCINI, in his
individual capacity; DOES I-XX, inclusive,

24 Defendants.

CASE NO. 2:24-cv-00074-APG-NJK

**STIPULATION AND PROPOSED ORDER
FOR EXTENSION OF TIME TO FILE
RESPONSE TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT [ECF NO.
55] AND PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT AS
TO LIABILITY AND CAUSATION [ECF
NO. 57]**

26
27 **IT IS HEREBY STIPULATED** between Plaintiff, LATIA ALEXANDER, individually as
28 heir of ISAIAH T. WILLIAMS and in her capacity as Special Administrator of the Estate of ISAIAH

T. WILLIAMS (hereinafter referred to as “Plaintiff”), by and through her counsel Adam J. Breeden, Esq. of BREEDEN & ASSOCIATES, PLLC and Corrine P. Murphy, Esq. of MURPHY’S LAW, PC, and Defendants, LAS VEGAS METROPOLITAN POLICE DEPARTMENT, KERRY KUBLA, BRICE CLEMENTS, ALEX GONZALES, RUSSELL BACKMAN, JAMES ROTHENBURG, and JAMES BERTUCCINI, by and through their counsel of record Craig Anderson, Esq. (hereinafter collectively referred to as “Defendants”), that:

IT IS HEREBY STIPULATED that Plaintiff shall have until Friday, June 20, 2025 to file their Response to Defendants’ Motion for Summary Judgment [ECF No. 55].

IT IS FURTHER STIPULATED that Defendants shall have until Friday, June 20, 2025 to file their Response to Plaintiff’s Motion for Partial Summary Judgment as to Liability and Causation [ECF No. 57].

IT IS SO STIPULATED AND AGREED.

Dated this 27th day of May, 2025.

Dated this 27th day of May, 2025.

BREEDEN & ASSOCIATES, PLLC

MARQUIS AURBACH

/s/ Adam J. Breeden

/s/ Craig Anderson

ADAM J. BREEDEN, ESQ.

CRAIG R. ANDERSON, ESQ.

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ORDER

Plaintiff shall have until Friday, June 20, 2025 to file their Response to Defendants' Motion for Summary Judgment [ECF No. 55].

Defendants shall have until Friday, June 20, 2025 to file their Response to Plaintiff's Motion for Partial Summary Judgment as to Liability and Causation [ECF No. 57].

IT IS SO ORDERED



CHIEF UNITED STATES DISTRICT JUDGE

DATED: May 28, 2025